



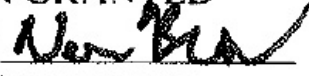
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September 13, 2023

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 09/18/2023

**Re: *International Flight Resources, LLC v. Aufiero* (Case No. 1:21-CV-03029-VSB),
Request for Leave to File Under Seal**

Dear Judge Broderick:

This firm represents Defendants Wells Fargo & Co. and Wells Fargo Merchant Services, LLC (collectively, “Wells Fargo”) in the above-captioned action. Pursuant to Rule 5(b)(ii) and 5(b)(iii) of Your Honor’s Individual Rules & Practices in Civil Cases, Wells Fargo submits this letter motion seeking leave to file certain documents under seal. Specifically, Wells Fargo respectfully requests permission to redact the highlighted portions of Exhibit 1 to Katherine Garland’s Declaration in Support of Wells Fargo’s Reply in Support of its Renewed Motion to Dismiss, and the Reply Memorandum of Law in Support of Wells Fargo’s Renewed Motion to Dismiss (collectively, the “Reply Submissions”).

The Reply Submissions contain highly sensitive and confidential information, including the terms of a Settlement Agreement that is subject to a confidentiality provision. The submissions likewise include non-public, business information reflecting Wells Fargo’s debt negotiation and settlement strategy. This information is either identical to, or substantially similar to, information that this Court has previously permitted Wells Fargo to file under seal in connection with its prior and renewed Motions to Dismiss. *See, e.g.*, ECF Nos. 37, 47, 76 (granting Wells Fargo’s prior motions to seal the same information).

For the foregoing reasons, Wells Fargo respectfully requests that the Court permit Wells Fargo to redact certain Settlement Agreement terms contained within the Reply Submissions.

Respectfully submitted,

/s/ Katherine A. Garland

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Katherine A. Garland